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November 15, 2017

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street S.W.
Washington, DC 20554

**Re: *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz*, GN
Docket No. 17-183; *Promoting Investment in the 3550-3700 MHz Band*, GN Docket
No. 17-258; *Restoring Internet Freedom*, WC Docket No. 17-108**

Dear Ms. Dortch:

On November 13, 2017, I met with Commissioner Michael O’Rielly; his Chief of Staff, Brooke Ericson; and his legal advisors, Erin McGrath and Amy Bender. During the meeting, we discussed wireless opportunities in C-Band spectrum. With respect to the 3.5 GHz proceeding, I discussed Comcast’s preference for larger geographic license areas, but also the need to ensure economic viability to encourage robust participation in auctions based on potential, different business models.

In addition, I emphasized the need for a clear, affirmative ruling on federal preemption in the Commission’s order in the *Restoring Internet Freedom* proceeding. In this regard, I noted that the Commission’s preemption analysis regarding interstate services and information services in its amicus brief filed in the Eighth Circuit in *Charter Advanced Services (MN), LLC v. Lange* applies with equal force to broadband Internet access service.¹

¹ See Brief of the Federal Communications Commission as Amicus Curiae in Support of Plaintiffs-Appellees at 7-13, *Charter Advanced Services (MN), LLC v. Lange*, No. 17-2290 (8th Cir. Oct. 27, 2017).

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Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Kathryn A. Zachem
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cc: Amy Bender
Brooke Ericson
Eric McGrath